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VIA ECF

The Honorable Vince Chhabria
United States District Judge
450 Golden Gate Avenue
San Francisco, CA 94102
Courtroom 4, 17th Floor

Re: *In re: Facebook, Inc. Consumer Privacy User Profile Litigation*

Dear Judge Chhabria:

I respectfully submit this letter on behalf of Facebook in response to the Court's order dated December 9, 2019 (ECF No. 349). Facebook does not object to completing fact and expert discovery before the parties litigate class certification, so long as the discovery cut-off is no earlier than July 16, 2021.

As Facebook has indicated in its prior submissions, the parties will require eighteen months or more to complete fact and expert discovery regarding the numerous and complex jurisdictional, merits, and class certification issues in dispute, and they will not be able to complete discovery prior to February 2021 (Plaintiffs' proposed deadline to file a motion for class certification). Accordingly, Facebook requests that, if the Court is inclined to adopt a schedule that closes fact and expert discovery before the class certification stage, the Court set a discovery deadline of no earlier than July 16, 2021 and a deadline for Plaintiffs' anticipated class certification motion of no earlier than August 6, 2021. Facebook respectfully reserves the right to raise objections to any case schedule that does not provide adequate time to complete all necessary discovery.

Respectfully,

/s/ Orin Snyder

Orin Snyder

cc: Lesley E. Weaver (Co-Lead Counsel)
Derek W. Loeser (Co-Lead Counsel)